

July 27, 2007

Mr. Bill Brattain
CRWQCB
Sacramento Office
11020 Sun Center Drive #200
Rancho Cordova, CA 95670-6114

RE: Comments on Silva Ranch Wet Weather Biosolids Storage Facility Tentative WDR

Dear Mr. Brattain:

After reviewing the tentative WDR, we would like to submit the following comments for your review and consideration.

Page 11, B. Discharge Specifications, Item 7

We request that there be added a statement that liquids removed from the pond's LCRS could also be discharged into temporary storage tanks. If there is water in the pond's LCRS, then there is a leak in the primary liner, and the leak would be repaired by draining the pond. Therefore there should be an option not to return the leak water to the pond.

Page 14, E. Solids Disposal, Item 3

The way this reads, any sediment from the pond has to be used as operations soil or taken to a landfill. Since accumulated materials are likely to be soil and biosolids and may not be suitable for operations soil, we would request that a provision be added that allows land application of these materials in accordance with Order Nos. 95-064 and 98-023.

We appreciate your review and consideration of the above items for inclusion in the final version of the WDR. Please contact myself or Jennifer Nevius at URS Corporation with any questions or concerns regarding these comments.

Sincerely,



Jonathan Hill
Technical Services Director
Synagro

cc: Jennifer Nevius, URS Corporation
Kirk Lucas, Synagro